



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ALC/DCP/PTH  
F. #2016R00505

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 4, 2019

**By ECF and Email**

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Re: United States v. Mark Nordlicht, et al.  
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. All of the enclosed materials qualify as "Discovery Materials" under the January 23, 2017 Stipulation and Order entered in the above-captioned case, ECF Docket No. 76, and their use and dissemination are restricted as provided in that Stipulation and Order. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017, November 7, 2017, December 26, 2017, March 6, 2018, April 2, 2018, May 10, 2018, June 28, 2018, October 5, 2018, October 26, 2018, January 4, 2019, and January 25, 2019. The government again requests reciprocal discovery from the defendants.

Defense Counsel  
February 4, 2019  
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The government has made available at First Choice Copy, for reproduction to the defendants, the following documents recently received by the government from the following parties:

- Bates-stamped version of the BDO work papers previously provided on the BDO laptops: BDO-PLAT-WP-00000001 - BDO-PLAT-WP-00063610;<sup>1</sup> and
- Emails and other documents received by the government, and produced by the following individuals whose names have been provided to you in the government's February 4, 2019 email:
  - K[*name provided in email*]-00000528 – K[]-00004045
  - ML-000000001 - ML-000006914
  - LC-000000001 - LC-000010073

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York

By:                     /s/                      
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cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)

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<sup>1</sup> The government previously produced to you by cover letter dated August 21, 2017 what the government believed to be Bates-stamped, PDF versions of the BDO workpapers contained on the BDO laptop. See ECF Docket No. 199. While preparing for trial, the government realized that BDO's production of those materials to the government was actually a duplicate of an earlier BDO production to the government (produced to you by cover letter dated July 3, 2017, see ECF Docket No. 165), due to BDO's accidental re-production to the government of the earlier BDO production.